

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

NON-PARTY TIKTOK, INC.'S MOTION TO FILE UNDER SEAL

Pursuant to Local Rule 5(C) and the Modified Protective Order (ECF No. 203, at 25), non-party TikTok, Inc. (“TikTok”) respectfully submits this Motion to Seal contemporaneously with its Motion to Redact. For all the reasons articulated in TikTok’s Motion to Redact, TikTok requests that this Court file under seal the unredacted versions of DTX 250, DTX 2520, DTX 2521, and DTX 2522.¹ These documents were provisionally filed under seal concurrently with TikTok’s Motion to Redact and pursuant to this Court’s Order outlining the procedure by which a non-party can object to the public use of confidential documents. *See* ECF No. 871.

Dated: July 26, 2024

Respectfully submitted,

s/ Jay Jurata

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¹ Redacted versions of DTX 250, DTX 2520, DTX 2521, and DTX 2522 are attached hereto as Exhibits D, E, F, and G, respectively. The lettering of the Exhibits attached here corresponds with how the same Exhibits are lettered in the related Motion to Redact.